DEC 28 1994

Mr. Roger Matoba
5665 White Mountain Ct.
Martinez, CA 94553

Dear Mr. Matoba:

This responds to your letter, addressed to Patricia Breslin, asking us to review our safety belt requirements for rear outboard seating positions in passenger vans. You stated that manufacturers interpret Safety Standard No. 208 to require the installation of shoulder belts for these seating positions. You expressed concern that this requirement creates a safety hazard for vehicles with a side aisle to rear seating locations. According to your letter, passenger seats next to the side aisle have shoulder belts that cross the aisle. You believe that these shoulder belts would block the exit of more rearward passengers in an emergency, and suggested that we eliminate this requirement.

Your understanding of Standard No. 208's requirements is not entirely correct. It is correct that the standard requires (S4.2.4) lap/shoulder safety belts in all forward-facing "rear outboard designated seating positions" in new passenger vans with a GVWR of 10,000 pounds or less. However, under S4.2.4.1, the term "rear outboard designated seating position" excludes, for purposes of this requirement, any seating positions that are "adjacent to a walkway located between the seat and the side of the vehicle, which walkway is designed to allow access to more rearward

seating positions." Therefore, the seating positions that you are concerned about are not required to have shoulder safety belts. The standard instead only requires manufacturers to provide lap safety belts for these seating positions.

NHTSA decided not to require shoulder safety belts at these seating positions because the agency recognized that the belts might obstruct an aisle designed to give access to rear seating positions. Manufacturers are, however, permitted to provide lap/shoulder belts if they choose to do so.

With respect to your concerns about the safety of shoulder safety belts which cross an aisle, I note that such belts do not in fact prevent rearward passengers from exiting the vehicle. Such passengers may exit the vehicle by going under or over the belt. They may also move the belt aside by spooling out the webbing, or even unlatch the belt. Indeed, any difficulty that rearward occupants face in exiting the vehicle is much smaller than that faced by rear-seat occupants in a two-door car or the occupants of middle seats. In considering the safety of such belts, it is also important to consider the extra protection offered by the shoulder belt to the occupant who wears it. We believe the vehicle manufacturer is in the best position to balance, for its vehicles, the benefits associated with this extra protection against any difficulties related to occupants entering and exiting the vehicle.

I hope this information is helpful. If you have any further questions, please contact Edward Glancy of my staff at (202) 366-2992.

Sincerely,

/s/ John Womack
for Philip R. Recht
Chief Counsel

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